

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

> Via E-Mail and U.S. Postal Service Mail Certified Mail Receipt No. 7000 0520 0021 6107 8254 Return Receipt Requested

October 27, 2008

Ezra R. Safdie, P.E. Acting Medical Center Director Department of Veterans Affairs Medical Center 4150 Clement Street San Francisco, CA 94121

Re: Veterans Affairs (VA) Medical Center PCB Cleanup – VA's Letter on Amendment 2, December 21, 2007 Self-Implementing PCB Cleanup Notification - USEPA Concurrence

Dear Mr. Safdie:

We appreciate your letter (not dated) regarding a second amendment (Amendment 2) to the December 21, 2007 Veterans Affairs' (VA's) Self-Implementing PCB Cleanup Notification for the New Emergency Room Building Site (ER Site). We believe that it is not necessary for USEPA to approve Amendment 2. In our opinion, the work described in this amendment is a continuation of the work approved under Amendment 1. According to the VA's consultants most of the field work in the proposed Amendment 2 was completed between August and September 2008 following the approved procedures in Amendment 1.

USEPA conditionally approved the VA's Notification under 40 CFR 761.61(a) on February 7, 2008 and subsequent notification amendments on May 7 and June 20, 2008 (herein collectively referred to as Amendment 1). We concur with the work described in the proposed Amendment 2 involving, among other activities, removal of PCB-containing paint and PCB-impacted concrete surfaces from the side of the retaining wall facing Building 200 and the Building 200 walls at basement level facing the retaining wall. Your consultants had kept my staff informed of the field work activities.

Finally, we understand that at a minimum, access constraints (i.e., high voltage lines) will impede the VA meeting the self implementing cleanup level equal to or less than 1 mg/Kg for soils and a section of the retaining wall. In order to avoid unnecessary construction delays, we recommend the VA submit a risk-based disposal application (under 40 CFR 761.61(c)) as soon as possible. The PCB cleanup at the VA's Medical Center is a high priority for USEPA and Ms. Carmen D. Santos, the staff assigned to this project, is still available to assist the VA with completion of the cleanup.

Ezra R. Safdie, P.E. Re: VA Medical Center PCB Cleanup October 27, 2008

Please call Ms. Santos of my staff at 415.972.3360 if you have any questions concerning this letter. We look forward to continue assisting the VA on its PCB cleanup at its Medical Center in San Francisco.

Sincerely,

Charle Ce Nebon

Associate Director

Waste Management Division

Cc: Kenneth Leung, AEW Engineering, Inc.

Lee Barrus, WASATCH

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